

Interpreter Services WorkGroup
Report on
Improving Interpreter Services for Dakota County's Community Services Division

- **Executive Summary**

English is the most common language spoken by County residents (92%). According to both County and census data, approximately 30,000 (8%) of Dakota County residents speak a language other than English. Approximately 55 different languages are spoken in the homes of County residents. The most common non-English languages encountered by Community Services Division (CSD) staff are Spanish, Russian, Somali, Hmong, Laotian, Vietnamese, and Sign Language. In order to efficiently provide programs and services that meet the needs of County residents with Limited English Proficiency (LEP), CSD staff must have a basic understanding of the impact of language and culture; more importantly, CSD staff and their clients must be able to communicate effectively. Interpreters and bilingual staff facilitate communication, which allows LEP clients to access County services. It also provides staff with greater assurance that they are providing LEP clients with appropriate services and programs.

In December 2000, the State, in an effort to implement the language access requirements of Title VI, requested each county to create LEP plans for health and social services programming. To facilitate the State's request, the County's CS Planning department, formed an Interpreter Services Workgroup that consisted of program and administrative staff from all departments. The Workgroup created three separate departmental LEP plans for Employment and Economic Assistance (E&EA), Public Health (PH) and Social Services (SS). Each LEP plan included the following components as directed and in the format provided by the State:

1. Assessment of Language Needs
2. Policies and Procedures on Language Access
3. Training of Staff on LEP Plan
4. Monitoring of LEP Plan

In April 2001, the three LEP plans were submitted to the State. The formal LEP plans also served as a model for the Community Corrections (CC) and Extension Services (Ext. Svcs) department's protocols for language access requirements. See Attachment A to review LEP plans for each department.

- **Issue and Charge**

A comparative analysis of the total cost to CSD for providing interpreter services from 2000 to 2001 shows that the expense went from approximately \$143,000 to \$225,000, a 58% increase. The estimated expense of interpreter services within CSD for 2002 is \$277,000. Refer to Attachment B to review the financial analysis. In July 2002, the CSD Director and department head discussed the issue of the escalating interpreter services cost to the County; the Director then requested CS Planning to study the issue and make recommendations for change as needed.

- **Current Process**

Within CSD, interpreter services are provided in-person or by telephone. Currently, the only division-wide contract in place for interpreter services is with Language Line, which provides telephone interpretation services. Language Line offers more than 140 languages and is available 7 days a week, 24 hours per day.

For face-to-face interpretation, the departments vary somewhat in how they arrange for services. In E&EA staff arranges for interpreter services via a centralized location, the Client Intake Services Desk. The Client Intake Services Desk personnel select an interpreter agency (an independent contractor is selected/used only as a backup) from a selected list of vendors and are responsible for verifying appointments and billing invoices.

Social Services, Extension Services and Corrections staff arrange for face-to-face interpretation by choosing from a selected list of interpreters agencies or independent contractors. Each staff person arranges and tracks their own appointments, as well as verifies the subsequent billing invoices. The payment of bills is centralized within these departments. For Corrections staff, access to interpreter services is typically not an issue at intake because District Court arranges and pays for interpreter services. Public Health staff is required to arrange for interpreter services based on payment reimbursement guidelines outlined in their PMAP, MA, and other contracts and the payment of bills is centralized.

Currently, there are no standardized ethical or competency standards for interpreters. However, across the division staff primarily use well-recognized interpreter agencies that have provided documentation of their interpreters' bilingual competency and experience. Each department provides staff training on LEP client procedures. Attachment A provides a summary of each department's LEP plans, including assessment of language needs, procedures for staff access to interpreter service providers, competency standards for providers, staff monitoring procedures, and staff training.

- ***Summary of Findings***

1. The need and cost for interpreter services continues to increase.
2. Division-wide approximately 70 interpreter providers are used, but only one formal contract is in place. That contract is for telephone interpretation.
3. Twenty-five (25) vendors provide 93% of CSD interpreter services and receive most of the dollars spent for services. Two percent (2%) of the vendors used are incorporated as interpreter agencies.
4. There is no uniform contracted rate for interpreter services. The average cost for interpreter services varies from \$25 to \$50 per hour with a typical 2-hour minimum.
5. A centralized list of contracted providers and/or centralized scheduling system could assist in controlling and monitoring the quality of services provided.
6. There is a need for standardized ethical and competency standards, regardless of whether the interpreter is with an agency or an independent contractor.
7. Inconsistencies among departments can arise without uniform contracted rates.
8. The County's lack of a centralized incoming telephone or message (English) interpreter system for receipt of LEP clients phone calls impedes LEP clients from having immediate access to services.
9. Development of standardized billing criteria would be helpful.
10. Using the same interpreters consistently over a long period of time may lead to misinterpretation that they are "county staff".
11. Hennepin County uses a formal standardized approach to providing Interpreter Services. Interpreters are selected from a defined list of vendors.

12. CSD must consider the impact changing the current approach to interpreter services. For example, changing CSD's working relationship with some long-time independent contractors may create issues for them such as needing to become incorporated, liability insurance, etc.

- **Recommendations**

- **Short-term**

1. Limit the number of vendors and use of independent contractors. One way to do this is to develop a centralized, standardized list of cost-effective and qualified interpreters. Departments should review frequently used vendors and work with CS Contracts unit to develop standard contracts with them. Competency and ethical standards (outlined in Attachment C) should be included in all interpreter contracts. These steps would ensure best practices standards are met in the areas of quality of service, competency, ethics and accountability, and provide uniform rates for services.
2. Develop a standardized billing form to be given to interpreters so that consistent billing information is provided.
3. Develop additional training (through EDGE) for staff (countywide) on working with interpreters. (This will help staff to better deal with quality of service, accountability and ethical issues.)
4. Consider the potential impact of changing the current way CSD identifies available interpreter services.

- **Long-Term or Future Study**

1. Consider developing a centralized incoming telephone or message (English) interpreter system for receipt of phone call from LEP clients. Currently LEP clients do not have access to services, as there is no system in place.
2. Consider developing a centralized system for staff to have access/ability to translate specific written materials and correspondence for mailings. Currently it creates problems when staff needs to mail out written materials or specific correspondence to LEP clients.
3. Consider creating a master database that reflects formal/contracted vendors. Staff could access this data base division-wide.
4. Consider purchasing social work, etc. from culturally competent agencies with bilingual workers. Instead of hiring interpreters, i.e. contract with a Somali or Spanish-speaking agency to carry a caseload of Somali or Spanish speaking clients.
5. Consider creating in-house (staff) interpreter services.

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• ***Background***

Dakota County has a population of approximately 355,000 (2000 census data) residents. English is the most common language spoken by County residents (92%). According to both County and census data, 30,000 (8%) of Dakota County residents speak a language other than English. Approximately 9,000 (3%) of these residents report that they do not speak English "very well." Approximately 55 different languages are spoken in the homes of County residents. Spanish is the most common non-English language frequently spoken followed by Vietnamese, Russian, Laotian, Hmong, Cambodian, Chinese, Somali and Korean.

The most common non-English languages encountered by Community Services Division (CSD) staff are Spanish, Russian, Somali, Hmong, Laotian, Vietnamese, and Sign Language. In order to efficiently provide programs and services that meet the needs of County residents with Limited English Proficiency (LEP), CSD staff must have a basic understanding of the impact of language and culture; and more importantly, CSD staff and their clients must also be able to communicate effectively. Interpreters and bilingual staff facilitates communication, which allows LEP clients to understand and become more familiar with County services and provides staff with greater assurance that they are providing and connecting LEP clients with appropriate services and programs.

In November 2000, the U.S. Department of Health and Human Services Office (DHHS), Office for Civil Rights, published policy guidelines on the prohibition against national origin discrimination as it affects persons with LEP as outlined in Title VI of the Civil Rights Act of 1964. The purpose of this policy guidance was to clarify the responsibilities of providers of health and social services who received federal financial assistance from DHHS, and to assist providers in fulfilling their responsibilities to persons with LEP. The State of Minnesota and other providers of health and social services had a legal obligation to comply with Title VI regulations.

In December 2000, the State, in an effort to implement the language access requirements of Title VI, requested each county to create LEP plans for health and social services programming. To facilitate the State's request, the County's CS Planning department, formed an Interpreter Services Workgroup that consisted of program and administrative staff from all departments. The Workgroup created three separate departmental LEP plans for Employment and Economic Assistance (E&EA), Public Health (PH) and Social Services (SS). Each LEP plan included the following components as directed and in the format provided by the State:

5. Assessment of Language Needs
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In April 2001, the three LEP plans were submitted to the State. The formal LEP plans also served as a model for the Community Corrections (CC) and Extension Services (Ext. Svcs) department's protocols for language access requirements.

- **Issue and Charge**

A comparative analysis of the total cost to CSD for providing interpreter services from 2000 to 2001 shows that the expense went from approximately \$143,000 to \$225,000, a 58% increase. The estimated expense of interpreter services within CSD for 2002 is \$277,000. The complete financial analysis can be reviewed in Attachment A.

COMMUNITY SERVICES DEPARTMENT	2000	2001	2002*	TOTAL	% **
SOCIAL SERVICES	35,446	48,245	56,663	140,354	59.9
EMPLOYMENT & ECONOMIC ASSISTANCE	17,267	45,149	69,993	132,409	305.4
PUBLIC HEALTH	67,435	108,606	103,896	279,937	54.1
COMMUNITY CORRECTIONS	18,808	17,977	17,099	53,884	(9.1)
WORKFORCE SERVICES	3,650	5,015	22,407	31,072	513.9
EXTENSION SERVICES	-	300	6,493	6,793	-
TOTAL	\$ 142,606	\$ 225,292	\$ 276,551	\$ 644,449	93.9

*Estimate 2002 Total

** % Increase from 2000 to 2002

In July 2002, the CSD Director and department head discussed the issue of the escalating interpreter services cost to the County; the Director then requested CS Planning to study the issue and make recommendations for change as needed.

CS Planning re-convened members of the Interpreter Services Workgroup, and provided them with the following directive: Study how interpreter services are provided including identifying issues and concerns regarding access, quality of services and cost, and making recommendations for improvements, if necessary. To facilitate the study, the Workgroup was asked to:

1. Take an inventory of how Interpreter Services are currently provided in each department, including assessment of language needs, procedures for how staff access Interpreter Services, competency standards and monitoring procedures for interpreters and staff training for accessing Interpreter Services;
2. Review Hennepin County's approach to consolidating Interpreter Services among a defined list of providers/vendors;
3. Complete a comparative financial analysis of (2000-2002) County expenditures and income for Interpreter Services, per department;
4. Identify the tradeoffs between the benefits of consistent, standardized contracting with a limited number of Interpreter Services provider/vendors and a more informal, individualized ad hoc approach to purchasing Interpreter Services.
5. Recommend options, if any, to the CS Division Director and Department Heads for:
 - a. Capturing additional non-County revenues such as Medical Assistance, etc.,
 - b. Contracting/purchasing Interpreter Services, and
 - c. Training staff on assessing efficient Interpreter Services.

- **Current Process**

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Across the division-wide bilingual staff is only used for short questions or small document translations otherwise interpreters are used. Family members and friends are not used as interpreters because of their possible lack of proficiency in either or both languages, lack of training in the interpretive process, and lack of familiarity with specialized program terminology. In accordance with state and federal guidelines, minor children are never used as interpreters.

The Department of Human Services is an available resource for obtaining translated forms and applications. Department staff can access translated forms and down load them from the DHS website or through other available sources.

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- **Financial Analysis**

There is no uniformed contracted rate for interpreter services. The average cost for Interpreter Services varies from \$25 to \$50 per a minimum 2-hour. For a complete review CSD expense for interpreter services, please refer to Attachment A.

The most important fact that emerged from the 2001 financial expenditures was that a total of 70 different interpreters providers are used by CSD. Of these 70 vendors: 25 vendors provide 93% of the services as follows:

Amount	Total Expense	% Total Expense	# Vendors
> \$10K	\$ 164,393	72.97	8
> \$ 5 K to 10 K	\$ 16,027	7.11	2
> \$ 1 K to 5 K	\$ 29,217	12.97	15
Total	\$ 209,638	93.05	25

Another important point is that 2% of vendors used are incorporated as Interpreter agencies.

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